

Theodore W. Chandler (Bar No. 219456)
<ted.chandler@bakerbotts.com>

BAKER BOTTS L.L.P.
1801 Century Park East, Suite 2400
Los Angeles, California 90067
Telephone: (213) 202-5702
Facsimile: (213) 202-5732

Cheryl A. Cauley (Bar No. 252262)
<cheryl.cauley@bakerbotts.com>

BAKER BOTTS L.L.P.
1001 Page Mill Road
Building One, Suite 200
Palo Alto, CA 94304-1007
Telephone: (650) 739-7500
Facsimile: (650) 739-7699

*Attorneys for Defendant
Internet Referral Services, LLC*

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

AXS GROUP LLC,

Plaintiff,

v.

INTERNET REFERRAL SERVICES,
LLC, EVENT TICKETS CENTER,
INC., VIRTUAL BARCODE
DISTRIBUTION LLC, ALTAN
TANRIVERDI, and
SECURE.TICKETS,

Defendants.

Case No. 2:24-CV-00377-SPG (Ex)

**STIPULATION TO EXTEND TIME
FOR DEFENDANT INTERNET
REFERRAL SERVICES, LLC TO
RESPOND TO FIRST AMENDED
COMPLAINT**

**FIRST AMENDED COMPLAINT
SERVED: MAY 6, 2024**

**CURRENT RESPONSE DATE:
JUNE 28, 2024**

**NEW RESPONSE DATE:
JULY 29, 2024**

Plaintiff AXS Group LLC (“AXS” or “Plaintiff”) and Defendant Internet Referral Services, LLC (“Referral Services”) stipulate and respectfully request that the Court extend the deadline for Referral Services to answer or otherwise respond to the First Amended Complaint by thirty days.

WHEREAS, on January 16, 2024, Plaintiff filed a Complaint in this action against Referral Services and four other Defendants (ECF No. 1);

STIPULATION TO EXTEND
TIME

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Case No. No. 2:24-CV-00377-SPG (Ex)

1 WHEREAS, on February 7, 2024, Plaintiff formally served Referral Services,
2 (ECF No. 24);

3 WHEREAS, the parties previously agreed to extend the deadline for Referral
4 Services to respond to the Complaint from February 28, 2024 to March 29, 2024
5 (ECF No. 26); from March 29, 2024 to April 29, 2024 (ECF No. 33); and then from
6 April 29, 2024 to May 29, 2024 (ECF No. 47);

7 WHEREAS, on May 6, 2024, Plaintiff filed its First Amended Complaint
8 (ECF No. 39);

9 WHEREAS, on May 31, 2024, the Court granted the parties' stipulation to
10 extend the deadline for Referral Services to respond to the First Amended Complaint
11 from May 29, 2024 to June 28, 2024 (ECF No. 50);

12 WHEREAS, the parties have been engaging in discussions to explore a
13 possible resolution of this matter;

14 WHEREAS, having additional time to engage in further discussions will be
15 beneficial to the potential for early resolution;

16 WHEREAS, AXS and Referral Services agree to a thirty (30) day extension
17 of time to Referral Services' deadline to answer or respond to the First Amended
18 Complaint so they can continue discussing a resolution to this matter;

19 THEREFORE, AXS and Referral Services stipulate to a thirty (30) day
20 extension of time, making Referral Services' answer or response to the First
21 Amended Complaint due on July 29, 2024.

22 It is so stipulated.

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1 Dated: June 25, 2024

DORSEY & WHITNEY LLP

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3 By: /s/ Connor J. Hansen
4 J. Michael Keyes (SBN 262281)
5 *keyes.mike@dorsey.com*
6 Connor J. Hansen (*pro hac vice*)
7 *hansen.connor@dorsey.com*
8 Columbia Center
9 701 Fifth Avenue, Suite 6100
10 Seattle, WA
11 Telephone: 206.903.8800
12 Facsimile: 206.903.8820

DORSEY & WHITNEY LLP
Kent J. Schmidt (SBN 195969)
schmidt.kent@dorsey.com
600 Anton Boulevard, Suite 200
Costa Mesa, CA 92626
Telephone: 714.800.1400
Facsimile: 714.800.1499

Attorneys for Plaintiff AXS Group LLC

14 Dated: June 25, 2024

BAKER BOTTS LLP

16 By: /s/ Cheryl A. Cauley
17 Cheryl A. Cauley
18 *cheryl.cauley@bakerbotts.com*
19 1001 Page Mill Road
20 Building One, Suite 200
21 Palo Alto, CA
22 Telephone: 650.739.7500
23 Facsimile: 650.739.7699

*Attorneys for Defendant Internet Referral
Services*

24 **FILER'S ATTESTATION**

25 Pursuant to Local Rule 5-4.3.4(a)(2)(i), the filing party hereby attests that all
26 signatories listed, and on whose behalf the filing is submitted, concur in this filing's
27 content and have authorized this filing.

28 /s/ Cheryl A. Cauley
Cheryl A. Cauley